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May 25, 2016

Robin Kelly Senior Campaign Finance Analyst Reports Analysis Division Federal Election Commission 999 E,Street N.W. Washington, DC 20463

Re: Pawlowski2016.com (C00576520); reported disbursement of \$76,500 on July 2, 2015, to H Street Strategies LLC, 840 W. Hamilton Street, Allentown, PA 18101

Dear Ms. Kelly:

We are writing on behalf of the subject committee and its treasurer, Lisa Pawlowski, with reference to the subject payment.

As Ms. Pawlowski explained in a letter to you dated January 22, 2016, this payment was never authorized by her as treasurer. Within a day or two after July 2, the payee abandoned its office location and business operations. The chief executive officer and co-owner of the payee was Michael Fleck. He also abruptly moved away from the Allentown area with no forwarding address or other contact information provided to the committee. Until July 2, Mr. Fleck had been the campaign manager of the Ed Pawlowski, U.S Senate campaign for the 2016 election cycle.

Mr. Fleck signed the subject check as he then had check signing authority on the campaign account. The check itself includes a memo line on which Fleck wrote: "April thru August [2015] consulting, rent and travel." The committee has no invoices or other similar records from the payee that might document the subject payment. Nor does the committee have any contract, informal or formal, with the payee LLC, or with Fleck himself regarding compensation for

campaign consulting services, office rent or travel expense reimbursement procedures. On the next business day after learning that the unauthorized check had cleared the committee's bank account, Ms. Pawlowski closed the account, as well as other accounts held by the committee that might be accessible by Fleck.

Given the above facts and circumstances, the committee and its treasurer, Lisa Pawlowski, believe that the subject \$76,500 payment represents the unlawful conversion of campaign funds to personal use by Michael Fleck in violation of 52 U.S.C. §30114 and relevant regulations of the Federal Election Commission.

Sincerely

N. Bradley Litchfield, Partner Oldaker Law Group, LLC

Faxed or Hand Delivered

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United States Senate

OFFICE OF THE SECRETARY

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